

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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WILLIAM J. WAGNER,

Plaintiff,

-vs-

CHIARI & ILECKI, LLP,

Defendant.

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**NOTICE OF CROSS-MOTION  
FOR SUMMARY JUDGMENT**

Docket No. 15-cv-633-FPG

**MOTION MADE BY:**

Defendant, CHIARI & ILECKI, LLP, by its attorneys,  
CONNORS LLP.

**DATE, TIME, & PLACE  
OF HEARING:**

On a date and time specified by the Court, before the Hon. Frank P. Geraci, Jr., in the United States District Court for the Western District of New York, at 100 State Street, Rochester, New York 14614. Oral argument is requested.

**SUPPORTING PAPERS:**

Declaration of Paul A. Woodard, Esq., with exhibits; Declaration of William Ilecki, Esq.; Declaration of Melissa Overbeck, Esq., with exhibits; Declaration of Karen Sandford, with exhibits; Declaration of Kristian Brown, with exhibit; Statement of Material Undisputed Facts; Response to Plaintiff's Statement of Undisputed Facts; Memorandum of Law; defendant's papers submitted in opposition to plaintiff's motion in limine (Doc. 19); and all other papers and proceedings in this action.

**RELIEF REQUESTED &  
GROUNDS FOR RELIEF:**

An Order of this Court granting defendant summary judgment on each of plaintiff's claims and dismissing this action in its entirety, with prejudice, pursuant to Rule 56 of the Federal Rules of Civil Procedure.

**REPLY PAPERS:**

Defendant intends to file and serve reply papers.

DATED: Buffalo, New York  
March 2, 2017

s/Paul A. Woodard  
Terrence M. Connors, Esq.  
Paul A. Woodard, Esq.  
**CONNORS LLP**  
Attorneys for Defendant  
1000 Liberty Building  
Buffalo, New York 14202  
(716) 852-5533  
[tmc@connorsllp.com](mailto:tmc@connorsllp.com)  
[paw@connorsllp.com](mailto:paw@connorsllp.com)